

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>MICHAEL ROBERTS,</b>	:	<b>CIVIL ACTION</b>
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>NO. 05-cv-0454 (GMS)</b>
	:	
<b>ALTAIR LINES, S.A.,</b>	:	
	:	
<b>Defendant/Third-Party Plaintiff,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>ACTIVE CRANE RENTALS, INC.,</b>	:	
	:	
<b>Third-Party Defendant.</b>	:	

**REQUEST FOR DOCUMENT PRODUCTION ADDRESSED TO PLAINTIFF BY  
DEFENDANT ACTIVE CRANE RENTALS, INC.**

You are hereby requested to produce, in accordance with Federal Rule of Civil Procedure 34, the originals or clear, readable copies of the below listed documents and/or items. These documents and/or items will be processed and photographs reproduced. The below listed documents and/or items are to be produced at the offices of Deasey, Mahoney & Bender, Ltd., Suite 1300, 1800 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103-2978, within thirty (30) days. Such request is continuing up to and at the time of trial.

1. The entire claims and investigation file or files of the defendant and/or its counsel or any other organization, excluding references to mental impressions, conclusions or opinions representing the value or merit of the claim or defense or respecting strategy or tactics and privileged communication from counsel.

2. All statements, memoranda, or writings (signed or unsigned) of any and all

witnesses including any and all statements, memoranda, writings of plaintiff and/or defendants.

3. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared.

4. Any and all documents containing the names and home and business addresses of all individuals contacted as potential witnesses.

5. All reports and Curriculum Vitae of any and all experts who will testify at trial.

6. Any and all medical reports, records, bills, memoranda and documents of any kind pertaining to Plaintiff's alleged injuries.

7. Any and all contracts, correspondence, bills, memoranda, receipts, employers' reports, tax returns, attendance records and wage statements relating to the Plaintiff's losses of income as a result of the occurrence alleged in Plaintiffs' Complaint for a period of five (5) years preceding the subject incident.

8. Any and all newspaper articles and/or articles from other periodicals regarding the subject matter of the present lawsuit.

9. Any and all releases or settlement agreements relevant to this litigation.

10. The court terms and numbers of any and all companion suits and/or other lawsuits arising out of the same set of operative facts herein.

11. Any and all reports of this incident.

12. Any and all documents requested in interrogatories directed to you.

13. All records documenting work performed by Murphy Marine Services, Inc., Magco Crane Rentals, Inc. or Altair Lines, SA in discharging cargo on the M/V SHINANO REEFER, including but not limited to Daily Work Reports, Time Sheets, Work Logs, Production Reports, Checker Reports, Hatch Tallies, Hatch Reports, Work Summaries, Gang Lists, and time

Sheets from Employees who worked on or about June 30, 2003 at the Port of Wilmington on board the M/V SHINANO REEFER.

14. All documents relating to plaintiff's claim for compensation under the LHWCA or the applicable state act including but not limited to U.S. Department of Labor forms, earnings records used to calculate average weekly wage, pleadings/filings from the compensation proceeding, correspondence to/from plaintiff's counsel, settlement agreements, payment records/ledgers showing payments made to plaintiff, hours and earnings records, medical records and bills, expert reports, impartial examination reports, etc.

15. All documentation relating to plaintiff's claim for medical benefits under the LHWCA or the applicable state act including but not limited to medical records, forms, diagnostic reports, medical bills, correspondence, office notes, radiographic studies, etc.

**REGER RIZZO KAVULICH & DARNALL, LLP**

BY: /s/ Louis J. Rizzo, Jr.  
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Attorney for Defendant,  
Active Crane Rentals, Inc.

Date: July 31, 2006

Pro Hac Vice Counsel:

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(215) 587-9456 (fax)

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of Defendant, Active Crane Rental's Request for Production of Documents Directed to Plaintiff was serviced upon all counsel by first class mail, postage prepaid, on the date set forth below:

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Attorney for Defendant, Active Crane Rentals,  
Inc.

Date: July 31, 2006